



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

October 15, 1991

Ms. Julie A. Vergeront  
Assistant Regional Counsel  
United States Environmental Protection Agency  
Region 10  
1200 Sixth Avenue  
Seattle, WA 98101-3188

Re: SO-125 General Electric/Spokane NPL Site

Dear Ms. Vergeront:

Ecology has the following comments on the October 10, 1991 draft letter to be issued to Dr. Deborah Hankins (General Electric) from Kenneth Feigner (EPA) regarding the PCB's located in the In-Situ Vitrification (ISV) demonstration cell on the subject site.

Page 3, Paragraph 2.

Ecology feels asphalt will not accomplish the assumed objectives for installing a temporary cap. Asphalt is unsuitable because: 1) Asphalt has a relatively high initial permeability; 2) It will be difficult to establish a seal around the PVC risers integral to the cell; 3) Asphalt will be difficult, if not impossible, to install with winter upon us; and finally 4) it is our opinion that asphalt applied this fall will fracture by spring. Failure to seal the risers, or fracturing of the asphalt, assuming it can be installed this fall, may result in failure of the temporary cap.

Accordingly, we recommend installation of a temporary geosynthetic cover. Materials are widely available locally, can be installed in minutes given the size of the area and have been shown in virtually all similar applications to outperform asphalt.

Page 5, Final Paragraph.

Ecology feels that some effort should be made to clarify the extent of TSCA regulatory authority on this site. Cleanup negotiations and studies are at a critical crossroads; confusion regarding authorities can only delay remedial action. We suggest, therefore, the final sentence of the letter be amended to read as follows: "If you have any questions regarding this specific issue, please contact either..." This language should assist in illustrating TSCA authority on the site to the PLP.

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Should you have additional questions, please contact the Site Manager, Guy Gregory, at (509) 456-6387.

Sincerely,

Flora J. Goldstein  
Eastern Regional Office Section Head  
Toxics Cleanup Program

FJG:GJG:adw

cc: Jerry Ackerman, AAG/Olympia  
Bob Kievit, EPA/WOO/Olympia  
Carol Fleskes, TCP/Olympia  
Guy J. Gregory, TCP/Spokane